

EXHIBIT NO. 31

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974; See Privacy Act Statement before completing this form.

AGENCY

CHARGE NUMBER

☐ FEPA☒ EEOC

473-2007-00245

OHIO CIVIL RIGHTS COMMISSION

and EEOC

State or local Agency, if any

NAME (Indicate Mr., Ms., Mrs.)

Mr. Donald Edwards

HOME TELEPHONE (Include Area Code)

STREET ADDRESS

CITY, STATE AND ZIP CODE

DATE OF BIRTH

NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT DISCRIMINATED AGAINST ME (If more than one list below.)

NAME

NUMBER OF EMPLOYEES, MEMBERS

TELEPHONE (Include Area Code)

The Palmer Group

15 +

(513) 422-1126

STREET ADDRESS

CITY, STATE AND ZIP CODE

COUNTY

4302 Roosevelt Blvd.

Middletown, OH 45044

NAME

TELEPHONE NUMBER (Include Area Code)

STREET ADDRESS

CITY, STATE AND ZIP CODE

COUNTY

CAUSE OF DISCRIMINATION BASED ON (Check appropriate box(es))

☒ RACE ☒ COLOR ☐ SEX ☐ RELIGION ☐ AGE
☒ RETALIATION ☐ NATIONAL ORIGIN ☐ DISABILITY ☐ OTHER (Specify)

DATE DISCRIMINATION TOOK PLACE EARLIER

Approx. September 15, 2006

☐ CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

1) On approximately September 8, 2006 I was asked by Cecelia Thompson if I was interested in working with the Middletown Community Center. I told Ms. Thompson that I was interested and would like the opportunity to apply for the job. Ms. Thompson informed me that I would be hired for the position, but I had to apply through the Palmer Group Temporary Employment Agency. I was told to wait one week before applying with the Palmer Group.

2) On approximately September 15, 2006 I went to the Palmer Group to fill out an application for the position.

3) The receptionist at the Palmer Group asked for my social security number, which I gave her. The receptionist then entered my social security number into a computer to pull up information about me.

4) After the receptionist received my social security number she went to discuss the situation with her boss. She then returned and told me: "My boss said that it wouldn't be appropriate" to hire you. I then asked to speak to the owner, Mary Jo Palmer, but was told that I could not speak to her.

5) I had previously applied for a position with AK Steel and had to go through the Palmer Group for the application process. Because of discriminatory hiring practices I was not hired by AK Steel. The Palmer Group was aware that I had filed a lawsuit against AK Steel for racially discriminatory hiring practices.

CONTINUED.....

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

NOTARY - (When necessary for State and Local Requirements)

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

I declare under penalty of perjury that the foregoing is true and correct.

SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(Day, month, and year)

Charging Party (Signature)

10/20/06

6) Upon information and belief, The Palmer Group would not allow me to apply for this position because of my race, African-American, and in retaliation for the previous lawsuit I had filed against AK Steel. The Palmer Group was aware of this lawsuit and aware that I tried to apply for the AK Steel position. In fact, The Palmer Group was part of the hiring process with AK Steel.

7) Because I had already been promised the position by Middletown Community Center, the only reason Palmer would not let me apply was because of the previous lawsuit I had filed. The Palmer Group has no legitimate reason for not allowing me to apply. In fact, after I was discriminated against by the Palmer Group, Ms. Thompson informed me I could go to CBS Personnel and apply for the same position. A week later, on approximately September 22, 2006, I went to CBS and was awarded the same position with the Middletown Community Center, where I am still employed today (through CBS Personnel).

I declare under penalty of perjury that the foregoing is true and correct.

Donald Edwards

Date

10/20/06

Charging Party (Signature)

SIGNATURE OF COMPLAINANT

Donald Edwards

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(Day, month, and year)

10/20/06

U.S. DEPARTMENT OF JUSTICE
EEOC CHICAGO OFFICE

NOV 02 2006

RECEIVED